REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

I.   STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 12, 13, 15 and 28-76 are pending in this application. Claims 12, 13, 15, 28, 35-39, 42, 44, 47, 50, 52, 55, 57, 60, 62, 70, 71 and 75 are independent. Claims 12, 13, 15, 28, 35-39, 42, 44, 47, 50, 52, 55, 57, 60, 62, 70 and 71 are hereby amended. Claims 1-11, 14 and 16-27 have been canceled without prejudice or disclaimer of subject matter. It is submitted that these claims, as originally presented, were in full compliance with the requirements 35 U.S.C. §112. No new matter has been introduced by this amendment. Support for this amendment is provided throughout the Specification. Changes to claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which the Applicants are entitled.

II.   REJECTIONS UNDER 35 U.S.C. §102(e)

Claims 12-15 and 28-76 were rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,445,877 to Okada, et al. (hereinafter, merely "Okada").

III.   RESPONSE TO REJECTIONS

Applicants submit that the claims are patentable over the art of record for at least

the following reasons. First, the maps, as recited in the claims, are distinct from each other. The

maps in Okada are linked together. Specifically, in Okada, the PTS map includes an index to the

PCR map. Secondly, the present invention recites that only one map is used. In

contradistinction, Okada describes using both maps, since the PTS map is needed to access the

PCR map. Both of these reasons are discussed herein.

A. Independent Claims 12, 13, 15, 28, 35-39, 42, 44, 47, 50, 52, 55, 57, 60, 62, 70 and 71 Recite That The Tables/Maps Are Distinct

Claims 12, 13, 15, 28, and 35-38 recite that the first and second tables are distinct.

Claims 39, 42, 44, 47, 50, 52, 55, 57, 60, 62, 70 and 71 recite that the entry point map is distinct

from the time unit map. Applicants submit that Okada describes two tables (PTS Map 813 and

PCR Map 811), which are related since the PTS Map 813 is an index to PCR Map 811.

Specifically, Applicants provide an annotated copy of Figure 21 of Okada.

Fig.21

PTS Map includes an index to PCR Map
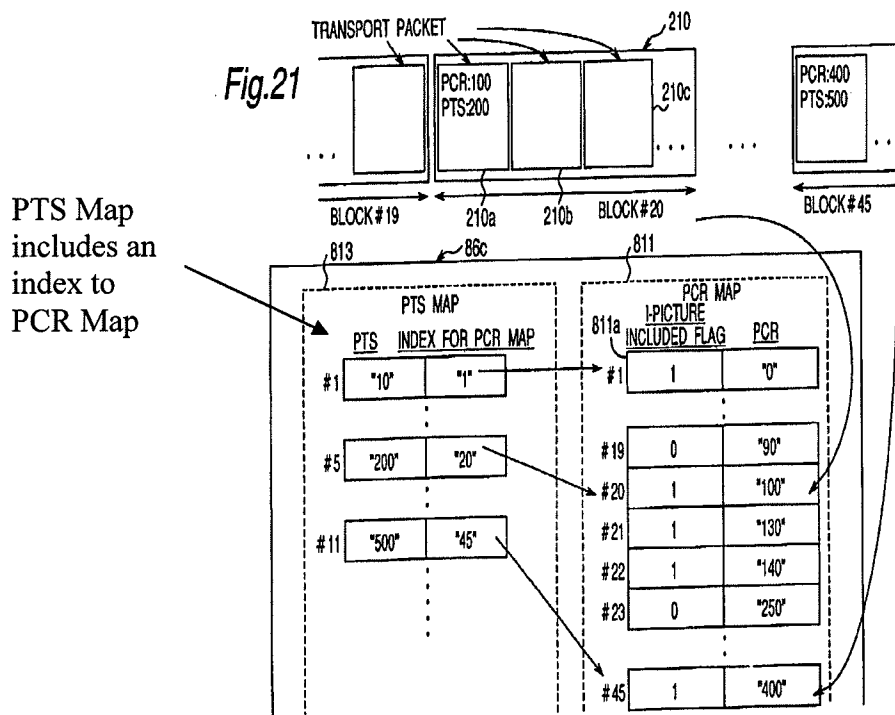
According to the description in Okada, FIG. 21 shows the details of the access map. As shown in FIG. 21, an access map 86c is made of a two-hierarchy comprising a PCR map 811 and a PTS map 813. The access map 86c manages an object in a block unit collecting a predetermined number (N) of ECC blocks. In the following, a group of N blocks acting as the management unit of the access map will be simply referred to as a "block". N is an integer of 1 or more and is fixed in the stream. One block includes a plurality of transport packets. In an example shown in FIG. 21, a 20th block 210 includes a plurality of transport packets 210a, 210b, 210c . . . .

The PCR map 811 is a table having an entry corresponding to a block, and, therefore, has the

same number of entries as the blocks. The PCR map 811 manages, for each entry, a PCR

(Program Clock Reference) given to the transport packet provided on the head of a block

indicated by the entry, and an I-picture included flag 811a for the block. The PCR is information

indicative of a time for input of the data to a decoder. The I-picture included flag serves to

identify that the data of the I-picture (self-reproduceable picture) of MPEG video data are stored

or not in the block. In the present embodiment, the I-picture included flag of "1" indicates that

the block includes the I-picture. In the example shown in FIG. 21, a value ("100") of the PCR

given to the transport packet 210a on the head of the 20th block 210 are stored in the 20th entry

of the PCR map 811, as well as the I-picture included flag ("1") for the 20th block 210.

The PTS map 813 is a table for managing the value of PTS (Presentation Time Stamp) for each

I-picture in the digital broadcasting objet (D_VOB). The PTS map 813 is comprised of the PTS

value for each I-picture and an index indicative of a block number in which the I-picture is

included. In the case where the I-picture is included in a plurality of blocks, only a number of a

head block of them in which the I-picture is included is stored as the index. In FIG. 21, it is

apparent from the PCR map 811 that the I-picture is stored from the 20th to 22nd blocks. **In this**

case, the fifth entry of the PTS map 813 stores the head block number of "20" of a block

group including the I-picture as the index for the PCR map together with a PTS value

("200") in the head block.

As shown in FIG. 21, the PCR map 811 is a table having an entry for each block and the order of

the entry in the PCR map 811 corresponds to a block number indicated by the entry. For this

reason, the block number corresponding to the PTS value is designated by using the order of the

PCR entry in the PCR map 811 in the index for the PCR map of the PTS map 813.

Thus, according to Okada, the PTS Map 813 includes an index for the PCR Map 811. In the claimed invention, the maps/tables are distinct.

B. Okada Describes Using Two Maps Since The PTS Map Serves As An Index To The PCR Map.

In general, Applicants submit that Okada describes a two-map hierarchy system in which both maps are used. In contrast to Okada, the present invention claims that a single map is selected from two maps. Thus, the present invention utilizes a single map while Okada uses two maps.

Indeed, Okada, column 26, lines 26-30 state:

"(Reproduction using PCR map/PTS map)
Referring to FIG. 22, next, description will be given to a method for reproducing a digital broadcasting object from PGC information using the PCR map 811 **and** the PTS map 813." (emphasis added)

Thus, the Okada reference describes using both the PCR Map 811 and the PTS Map 813.

Specifically, Applicants submit that the two maps recited in claim 12 are not related and that **one map is enough to make random access for an AV stream**.

Applicants submit that nothing has been found in Okada that would teach or suggest the features of independent claim 12. Specifically, Applicants submit that Okada fails to teach or suggest two determining steps and a reproducing step of reproducing **one of** a first table describing the relation of correspondence between presentation time stamp and an address in said

AV stream data of a corresponding access unit or a second table describing the relation of

correspondence between arrival time stamp derived from the arrival time point of a transport

packet and an address in said AV stream data of a corresponding transport packet, from said

recording medium, as recited in claim 12.

Claim 12 recites, *inter alia*:

> "...<u>a first determining step of determining whether a first table is recorded
> on the recording medium, the first table recorded as a function of a first
> recording method;</u>
> <u>a second determining step of determining whether a second
> table is recorded on the recording medium, the second table
> recorded as a function of a second recording method;</u>
>
> a reproducing step of **reproducing only one of either the
> first table or the second table,**
>
> **wherein the first table** describes a relation of
> correspondence between a presentation time stamp and an
> address in said AV stream data of a corresponding access
> unit, and
>
> **wherein the second table describes a relation of
> correspondence between an arrival time stamp derived
> from an arrival time point of a transport packet and an
> address in said AV stream data of a corresponding
> transport packet,** from said recording medium based on
> the first determining step or the second determining step,
>
> wherein the first table is distinct from the second table..."
> (emphasis added)

Therefore, claim 12 is patentable.

Claims 13 and 14 recite similar, or somewhat similar, features and are patentable

for similar reasons.

Similarly, claim 15 recites, *inter alia*:

> "...wherein the digital processor reads <u>only one table; one
> of either</u> the first table or the second table based on the first

> identification module or the second identification module
> ..." (emphasis added)

Applicants submit that nothing has been found in Okada that would teach or suggest the above-identified features of independent claim 15. Specifically, Applicants submit that Okada fails to teach or suggest one of a first table describing the relation of correspondence between presentation time stamp and an address in said AV stream data of a corresponding access unit and a second table describing the relation of correspondence between arrival time stamp derived from the arrival time point of a transport packet and an address in said AV stream data of a corresponding transport packet, depending on a recording method, as recited in claim 15. Furthermore, claim 15 recites that **only one table; one of either the first table or the second table is read**.

Therefore, claim 15 is patentable.

Claim 28 recites, *inter alia*:

> "a controller for generating **only one table; the one table being either a first table or a second table**
>
> **wherein the first table** describes a relation of correspondence between a presentation time stamp and an address in said AV stream data of a corresponding access unit,
>
> **wherein the second table** describes a relation of correspondence between an arrival time stamp derived from an arrival time point of a transport packet and an address in said AV stream data of a corresponding transport packet; and
>
> a recorder for recording **one of the generated first table or the generated second table**, on said recording medium with said AV stream data, based on the controller." (emphasis added)

Applicants submit that nothing has been found in Okada that would teach or suggest the above-identified features of independent claim 28. Specifically, Applicants submit

that Okada fails to teach or suggest a controller for generating a first table describing the relation

of correspondence between presentation time stamp and an address in said AV stream data of a

corresponding access unit, **or** a second table describing the relation of correspondence between

arrival time stamp derived from the arrival time point of a transport packet and an address in said

AV stream data of a corresponding transport packet; and a recorder for recording one of the first

and second tables, as selected depending on a recording method, on said recording medium along

with said AV stream data, as recited in claim 28. Applicants submit that the selection of the

generation of one of the tables is distinguished from the two-map system described in Okada.

Therefore, claim 28 is patentable.

Claims 35-39 and 42 recite similar, or somewhat similar, features and are

patentable for similar reasons.

Claim 44 recites, *inter alia*:

> "a controller operable to generate playlist information and
> map information corresponding to clip information,
> wherein said clip information including said audio and/or
> picture information, wherein said playlist information
> including at least one play item designated by an in-point
> and an out-point of the clip information, <u>said map
> information including only one map; one of either
> (i) an entry point map describing the relationship between a
> presentation time stamp of an entry point and an address of
> a respective entry point, or (ii) a time unit map describing
> the relationship between an arrival time stamp of a time
> unit and an address of a respective time unit</u>..." (emphasis
> added)

Applicants submit that nothing has been found in Okada that would teach or

suggest the above-identified features of independent claim 44. Specifically, Applicants submit

that Okada fails to teach or suggest that the map information includes **only one map; one of**

either an entry point map **or** a time map, as recited in claim 44.

Therefore, claim 44 is patentable.

Claims 47, 50, 52, and 55 recite similar, or somewhat similar, features and are

patentable for similar reasons.

Claim 57 recites, *inter alia*:

> "a reproducing device for reproducing from a storage
> medium on which playlist information and map
> information corresponding to a stream file...
>
> ... said playlist information including at least one PlayItem
> having IN time to indicate the presentation start time of
> PlayItem and OUT time to indicate the presentation end
> time of PlayItem,
>
> wherein said map information **includes only one map; one
> of either:**
>
> (i)   an entry point map describing the relationship
>   between a presentation time stamp of an entry point
>   of the stream file and an address of a respective
>   entry point**, or**
> (ii)   (ii) a time unit map describing the relationship
>   between an arrival time stamp of a time unit of the
>   stream file and an address of a respective time
>   unit..." (Emphasis added)

Applicants submit that nothing has been found in Okada that would teach or

suggest the above-identified features of independent claim 57. Specifically, Applicants submit

that Okada fails to teach or suggest a reproducing device for reproducing from a storage medium

on which playlist information and map information corresponding to a stream file are stored, said

stream file including said audio and/or picture information, said playlist information including at

least one PlayItem having IN time to indicate the presentation start time of PlayItem and OUT

time to indicate the presentation end time of PlayItem, said map information including **only one**

map; one of either (i) an entry point map describing the relationship between a presentation

time stamp of an entry point of the stream file and an address of a respective entry point, **or** (ii) a time unit map describing the relationship between an arrival time stamp of a time unit of the stream file and an address of a respective time unit, as recited in claim 57.

Therefore, claim 57 is patentable.

Claims 60 and 62 recite similar, or somewhat similar, features and are patentable for similar reasons.

Claim 70 recites, *inter alia*:

> "...an entry point map describing the relationship between a presentation time stamp of an entry point of audio and/or picture information recorded thereon and an address of a respective entry point, or a time unit map describing the relationship between an arrival time stamp of a time unit of said information and an address of a respective time unit in accordance with a type of said input audio and/or picture information,
>
> wherein the flag type indicates a type of recording process used to record only one map; one of either the entry point map or the time unit map." (emphasis added)

Applicants submit that nothing has been found in Okada that would teach or suggest the above-identified features of independent claim 70. Specifically, Applicants submit that Okada fails to teach or suggest an entry point map describing the relationship between a presentation time stamp of an entry point of audio and/or picture information recorded thereon and an address of a respective entry point, **or** a time unit map describing the relationship between an arrival time stamp of a time unit of said information and an address of a respective time unit in accordance with a type of said input audio and/or picture information, as recited in claim 70.

Therefore, claim 70 is patentable.

Claim 71 recites similar, or somewhat similar, features and is patentable for similar reasons.

Claim 75 is directed to generating an EP file based on a determination of a file type of the clip information. Indeed, claim 75 recites, *inter alia*:

"...determining a file type of the clip information;

generating a map from the file clip information if the clip information file is an EP_map type; and

generating a clip audio/video stream from the EP_map."

Applicants submit that Okada, as discussed above, is silent to this feature. Therefore Claim 75 is patentable.

IV.   DEPENDENT CLAIMS

The other claims in this application are each dependent from one of the independent claims discussed above and are therefore believed patentable for at least the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual reconsideration of the patentability of each on its own merits is respectfully requested.

Similarly, because Applicants maintain that all claims are allowable for at least the reasons presented hereinabove, in the interests of brevity, this response does not comment on each and every comment made by the Examiner in the Office Action. This should not be taken as acquiescence of the substance of those comments, and Applicants reserve the right to address such comments.

CONCLUSION

In the event the Examiner disagrees with any of statements appearing above with respect to the disclosure in the cited reference, it is respectfully requested that the Examiner specifically indicate those portions of the reference, providing the basis for a contrary view.

In view of the foregoing amendments and remarks, it is believed that all of the claims in this application are patentable and Applicants respectfully request early passage to issue of the present application.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

Respectfully submitted,

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